



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

STEPHANIE DE ANGELIS
Assistant Corporation Counsel
Phone: (212) 356-3513
Fax: (212) 356-3509
Email: sdeangel@law.nyc.gov

January 27, 2021

BY ECF

Judge Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Zeng v. Chell, et al.,
19-CV-3218 (JGK)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to the defense of the above-referenced matter. In that capacity, the undersigned writes to respectfully request that the discovery deadline be extended from February 1, 2021 until thirty (30) days after the resolution of Defendants' Motion to Dismiss should any claims remain post motion. This request is necessary because plaintiff's Opposition and Defendants' Reply papers will now be due outside the current discovery deadline. This is defendants' first request for an extension of time to complete discovery and while the undersigned has attempted contact *pro se* plaintiff, Xiamin Zeng, in order to confer with her regarding her consent to this request, the undersigned has been unable to reach her via email or telephone.

Defendants thank the Court for its time and attention to this matter.

Respectfully submitted,

Stephanie De Angelis/s/
Stephanie De Angelis
Assistant Corporation Counsel

cc: By E-MAIL
Xiamin Zeng
amyzane77@gmail.com